

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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DATCARD SYSTEMS, INC., a California Corporation

CIVIL NO: \_\_\_\_\_

Plaintiff,

v.

PACSGEAR, INC., a California Corporation

**NOTICE OF MOTION AND MOTION BY  
SORNA CORPORATION TO  
QUASH A THIRD PARTY SUBPOENA  
AND FOR A PROTECTIVE ORDER**

Defendant.

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U.S. District Court for the Central District of  
California. Case No: SACV 10-1288 DOC  
(VBKx)

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE Pursuant to Fed. R. Civ. P. 26(c) and 45(c), non-party Sorna Corporation and its affiliates (“Sorna”) respectfully seeks: (1) an order quashing the subpoena *duces tecum* (collectively, the “Subpoena”) served on Sorna by PacsGear, Inc. (“PacsGear”) and (2) a protective order from this Court prohibiting PacsGear or DatCard Systems, Inc, from requiring production of documents from Sorna in the related matter.

This Motion is based upon this Notice, the accompanying Memorandum of Points and Authorities, all pleadings and papers filed in this action, and upon such other matters as may be presented to the Court at the time of hearing.

Dated: March 14th, 2011

**F.S. FARRELL, LLC**

By: /s/Frank S. Farrell

**F.S. FARRELL, LLC**

Frank S. Farrell (MN #28447)

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Attorneys for non-party Sorna Corporation, Inc.

**CERTIFICATE OF SERVICE AND**

I hereby certify that on March 14, 2011 a copy of the foregoing document, supporting memorandum, word count certificate, proposed order, and affidavit of Cyrus Samari were filed electronically. I served a copy of the same by email and US Mail on:

Bill Holbrow  
12400 Wilshire Blvd.  
Seventh Floor  
Los Angeles, CA 90025-1030  
Phone: 310-207-3800  
Fax: 310-820-5988  
Bill\_Holbrow@bstz.com

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and executed on March 14, 2011, in the City of Edina, State of Minnesota.

**/s/ Frank S. Farrell**

Frank S. Farrell